VIII. ISSUES

SLDS

One issue was identified for the SLDS residual radioactivity concentrations in the SLDS inaccessible soil. This issue is discussed in the following paragraphs and summarized in Table VIII-1. SLDS Issue.

Residual radioactivity concentrations in the SLDS inaccessible soil:

As described in Section III, the SLDS has been separated into two operable units (OUs): 1) the Accessible Soil and Ground-Water OU and 2) the Inaccessible Soil OU. The Accessible Soil and Ground-Water OU consists of the accessible soil and ground water contaminated as the result of MED/AEC uranium processing activities at the Mallinckrodt plant. The Inaccessible OU consists of Mallinckrodt Buildings 25 and 101 and contaminated soil that is currently inaccessible due to the presence of buildings, active rail lines, roadways, the levee, and other permanent structures. The Inaccessible Soil OU was excluded from the scope of the 1998 SLDS ROD because the inaccessible soil did not present a significant threat in its current configuration and because activities critical to Mallinckrodt's continued operations prevented excavation beneath the encumbrances (e.g., roads, active railroads, Buildings 25 and 101). Contamination present within Building 25 also did not present an excessive risk under its current configuration. Because land use has remained the same at the SLDS since the 1998 SLDS ROD was signed, these determinations hold true today. Thus, while the presence of residual inaccessible soil exceeding remediation goals does not currently affect the protectiveness of the remedy, it could potentially affect the protectiveness of the remedy in the future if not addressed.

Table VIII-1. SLDS Issue

Issue	Currently Affects Protectiveness (Y/N)	Affects Future Protectiveness (Y/N)
Residual radioactivity concentrations in the SLDS inaccessible soil: Radionuclides may remain in the SLDS inaccessible soil at concentrations above background values. USACE is currently developing the CERCLA documentation necessary to address inaccessible soil at the SLDS. A Long-Term Stewardship Plan will be prepared to document processes and procedures with respect to requirements under CERCLA.	No. Existing land use controls provide sufficient protectiveness.	Yes. Failure to develop a Long-Term Stewardship Plan may result in inadequate land use controls for inaccessible soil remaining after accessible soil remediation is complete.

North St. Louis County Sites

One issue was identified for the North St. Louis County sites: thin cover material at the HISS. This issue is discussed in the following paragraphs and summarized in Table VIII-2.

Table VIII-2. North St. Louis County Sites Issue

Issue	Currently Affects Protectiveness (Y/N)	Potentially Affects Future Protectiveness (Y/N)
Thin Cover Material at the HISS: The site inspection found vegetative cover on the northern area of the property inside the fence was thin. The cover material (soil) at the HISS is seeded several times per year; however, site drainage patterns appear to be impeding the establishment of vegetative cover. The USACE will reseed the cover material at the HISS to increase the vegetative cover present at the site. If unsuccessful through reseeding, other options will be considered to address the issue.	No. The rock in some areas had been displaced down to the geofabric. The geofabric cover remains and the underlying soil layer is not yet exposed.	Yes. Failure to establish adequate ground cover could result in exposure of the contaminated layer to surface water erosion and the movement of contaminated material.

Thin Cover Material at the HISS:

Although most of the site was well covered with vegetative growth and geofabric covered with rock, the site inspection found vegetative cover on the northern area of the property inside the fence was thin. The rock in some areas had been displaced down to the geofabric. Unforeseen delays in the selection of the final response action for the North St. Louis County sites led to the site's current state. The current site drainage pattern impeded the growth of vegetation despite regular attempts to seed the area. The condition of the vegetative cover does not currently affect the protectiveness of the response action. Even with total loss of the soil cover, the rock and plastic layers would prevent further erosion at the HISS. However, the protectiveness of the remedy in the future could be adversely affected if it resulted in exposure of the contaminated layer to surface water erosion.